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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

In re DMCA Subpoena to Google LLC,  
D/B/A YouTube

Misc. Case No.:

**DECLARATION OF DAVID  
SILVER RE DMCA SUBPOENA  
TO GOOGLE LLC, D/B/A  
YOUTUBE PURSUANT TO 17  
U.S.C. § 512(H)**

I, David Silver, declare under penalty of perjury that the following contents of this Declaration are true and accurate. If called upon, I am competent to testify as to the matters contained in this Declaration.

1. I am an attorney licensed to practice law in the State of California and in the State of Nevada and I am admitted to practice before this Court. I am an attorney-at-law in the law firm of Bayramoglu Law Offices LLC, where I practice

primarily intellectual property law including patents, trademarks, and copyrights, and I am representing Petitioner Zhenjing Kuang (“Petitioner”) in this matter.

2. Petitioner is the exclusive owner of the copyright in and to numerous videos featuring monkeys and Petitioner's interactions with monkeys.

3. Petitioner has nearly 2 million followers on TikTok where he posts his videos of himself interacting with monkeys.

4. Petitioner is the owner of the “Monkey Mania” channel on YouTube with the user name “@RealMonkeyKing.”

5. Despite Petitioner appearing personally in the majority of his videos, the “Naughty Monkeys-2118” channel run by the user “@NaughtyMonkeys” is pirating Petitioner’s videos with the intent to profit from Petitioner’s popularity.

6. Petitioner is requesting the attached proposed subpoena that would order YouTube to disclose the identity, including the name(s), address(es), telephone number(s), and e-mail addresses(es), and the financial information of the user operating the “@NaughtyMonkeys” account and running the “Naughty Monkeys-2118” channel of YouTube’s platform.

7. The purpose for which this subpoena is sought is to obtain the identity of the user operating the “@NaughtyMonkeys” account and running the “Naughty

Monkeys-2118” channel who has posted the content infringing Petitioner’s copyrights on the YouTube platform and to determine the potential damages Petitioner would be seeking in enforcing Petitioner’s copyrights.

8. The information obtained will be used for the purpose of protecting the rights granted to Petitioner under the Copyright Act.

9. Petitioner will be submitting a notification to YouTube under 17 U.S.C. § 512(c)(3)(A) that will accompany the requested subpoena in accordance with 17 U.S.C. § 512(h). A true and accurate copy of the notification letter is attached hereto as Exhibit 1.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 12th day of September, 2024 at Las Vegas, Nevada.

By: /s/ David Silver  
David Silver, Esq.